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Via Email and ECF

Hon. Leshann DeArcy Hall  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Velasquez Larin;*  
20 Cr. 228 (LDH)

Dear Judge DeArcy Hall:

I write to update your Honor with regard to the government's late-night request for disclosure of ex parte filings by the Coordinating Discovery Attorney ("CDA").

By way of background, the CDA program for CJA counsel was created to help expend CJA funds more efficiently. A defense discovery management strategy is decided and then executed. It involves in-course work by the CDA and other third-party "defense only" technology companies who create proprietary programs to help cull through voluminous discovery. The discovery management strategy is discussed with the defense team and the CDA and is decided by the Court. Additionally, vendors identities, and their programs, are meant to increase efficiency and form the basis for these funding requests, which are of no legitimate concern to the government.

Pt. A of Judiciary Policy, Volume 7 – Defender Services, Chapter 5, Section 510.30 – Limitations on Disclosure, states that "Generally, such information which is not otherwise routinely available to the public should be made available unless it: (a) is judicially placed under seal; (b) could reasonably be expected to unduly intrude upon the privacy of attorneys or defendants; (c) could reasonably be expected to compromise defense strategies, investigative procedures, attorney work product, the attorney client relationship or privileged information provided by the defendant or their sources; or (d) otherwise adversely affects the defendant's right to the effective assistance of counsel, a fair trial or an impartial adjudication."

Accordingly, it is respectfully submitted that the government's request should be denied; or, in the alternative, the matter should be held in abeyance until the CDA, here Ms. Greenwood and the Defender Services Office have had an opportunity to be heard.

Your Honor's attention to this matter is greatly appreciated.

Respectfully submitted,  
*Susan G. Kellman*  
Susan G. Kellman  
Grainne O'Neill

cc: All Counsel